

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:  
**Paul Miltoin Hofer and  
Shannon Maureen Hofer,  
Debtors**

Chapter 13

CASE NO: 1:19-bk-01311-HWW

**MOTION TO REOPEN CASE**

**AND NOW**, this 23rd day of April, 2025, the Debtors, by and through their attorney, Dawn M. Cutaia, file this Motion to Reopen Case and in support thereof state the following:

1. Debtors filed a Chapter 13 bankruptcy on March 30, 2019.
2. Debtors' First Amended Plan was confirmed on February 13, 2020.
3. Debtors' Plan stripped the second mortgage held by Ditech but Ditech has failed to satisfy the mortgage.
4. Debtors need to open their case so they can file an adversary action to request that the Court mark the lien satisfied.
5. Debtors received a Chapter 13 discharge on April 25, 2024 and their case was subsequently closed on June 18, 2024.

**WHEREFORE**, Debtor respectfully requests this Honorable Court reopen Debtors' case.

Respectfully Submitted,

FRESH START LAW, PLLC

By: /s/ Dawn M. Cutaia  
Dawn M. Cutaia  
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Chapter 13

CASE NO: 1:19-bk-01311-HWV

**ORDER**

Upon consideration of the Debtors' Motion to Reopen, said Motion is hereby **GRANTED**  
and the Debtor's Chapter 13 case is opened.